

EXHIBIT H

**TIME AND EXPENSE PROTOCOL PROPOSAL TO ENSURE EFFICIENT
MANAGEMENT OF THIS CASE**

Proposed Time and Expense Protocol guidelines will include the following, as set forth below:

- a. I will appoint a member of the Plaintiffs' Steering Committee ("T&E Counsel") to oversee and enforce the Time and Expense Reporting Protocol, and the collection and review of counsels' time and expense submissions in this litigation. Submissions will be made using Time and Expense Report templates drafted by T&E Counsel.
- b. Time and Expense Reports will be submitted to T&E Counsel on the 15th of each month (or the first business day thereafter) for the preceding month.
- c. All Time and Expense Reports will be certified by an attorney with authority in each firm attesting to the accuracy of the submissions.
- d. Time submissions must be based on contemporaneously kept records. Reports must be recorded in tenth of an hour increments.
- e. T&E Counsel will monitor rates for professional staff working on this matter to ensure that they are consistent with market rates for national class action work, including appropriate caps for work such as document review.
- f. No contract lawyers will be used to work on this case without prior written approval of T&E Counsel or Lead Counsel.
- g. Time reported must include a detailed description of the work performed. Task descriptions such as "attended conference," "performed legal research" or "reviewed documents" shall be deemed insufficient.
- h. Work performed will be monitored to eliminate duplicative work. Work performed by those not in a leadership position must have authorization from Interim Lead Class Counsel for any work undertaken in this litigation.
- i. Each law firm will provide to T&E Counsel a list of the proposed attorneys and paralegals who will bill time on this case, their customary and usual court-approved rates, each attorney's position (partner, associate, senior counsel, etc.), and the year of law school graduation. Counsel reserves the right to harmonize these rates.

- j. T&E Counsel will eliminate time for reading/reviewing filings, orders, email, transcripts and/or other documents unless it was authorized by Interim Lead Class Counsel or necessary for a particular task.
- k. Attorney attendance at hearings, depositions or other meetings shall be limited by Interim Lead Class Counsel.
- l. Only reasonable and relevant expenses incurred for work performed to advance the litigation will be considered as compensable expenses.
- m. Receipts for all expenses incurred must be maintained by the submitting counsel and submitted with Time and Expense Reports on a monthly basis.
- n. Any expenses submitted more than two months in arrears will not be including or considered as a compensable expense and will be disallowed, except for good cause shown and with the approval of T&E Counsel/Interim Lead Class Counsel.
- o. On the expense report, a detailed and specific description is required (there will be categories of expenses on the template).
- p. When air/ground travel is required and overnight travel is necessary, counsel shall obtain reasonably-priced tickets and hotel accommodations at the lowest available fare/rate.